

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**JO Y. RICHARDSON,**

Plaintiff,

vs.

**DAMON BERTI,  
SHERIFF GARY TOELKE,  
FRANKLIN COUNTY, MISSOURI**

Defendants.

**Case No. 4:12-CV-00543 CDP**

**PLAINTIFF'S PROPOSED JURY INSTRUCTIONS**

COMES NOW Plaintiff, Jo Richardson, by and through undersigned counsel and submits her proposed jury instructions, attached and incorporated as if fully stated herein.

FRANK, JUENGEL & RADEFELD  
ATTORNEYS AT LAW, P.C.

By: /s/ Matthew A. Radefeld  
MATTHEW A. RADEFELD (#52288)  
*Attorney for Plaintiff Richardson*  
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Clayton, Missouri 63105  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on **May 27, 2014** the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mark Zoole and William Hellmich:

By: /s/ Matthew A. Radefeld  
MATTHEW A. RADEFELD